

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FORMAN HOLT ELIADES & YOUNGMAN LLC
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Proposed Special Counsel for Barbara A. Edwards,
Chapter 7 Trustee

In Re:

BENJAMIN JEFFERY ASHMORE,

Debtor.

Case No.: 13-17450 (VFP)

Chapter: 7

Judge: Hon. Vincent F. Papalia

Hearing Date: January 12, 2016
At 10:00 a.m.

MOTION TO REOPEN CASE

PLEASE TAKE NOTICE that on January 12, 2016, at 10:00 a.m., or as soon thereafter as counsel may be heard, Forman Holt Eliades & Youngman LLC proposed special counsel for Barbara A. Edwards, Trustee for the captioned debtor, will appear before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, United States Bankruptcy Court, 50 Walnut Street, Courtroom E, Newark, New Jersey, 07102, and seek entry of an order reopening the captioned bankruptcy case.

PLEASE TAKE FURTHER NOTICE that the Trustee shall rely upon the Certification of Barbara A. Edwards and the Memorandum of Law filed in support of the motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the motion must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and D.N.J. LBR 9013-2, and must be filed with this court and served upon and received by proposed special counsel

to the Trustee at Forman Holt Eliades & Youngman LLC, Attn: Michael E. Holt, Esq., 80 Route 4 East, Suite 290, Paramus, NJ 07652, within seven (7) days prior to the hearing date.

PLEASE TAKE FURTHER NOTICE that, in the event that timely objections are not filed with the court and served upon the Trustee's counsel as provided in D.N.J. LBR 9013-3, the motion be deemed uncontested and the court may, in its discretion, grant the requested relief.

FORMAN HOLT ELIADES & YOUNGMAN LLC
Proposed Special Counsel for
Barbara A. Edwards, Trustee

By: /s/ Michael E. Holt
Michael E. Holt